



Re: Revised Work Plan for Vermiculite Intermountain Site

Craig Barnitz

to:

Joyce Ackerman, David Wilson, Dale Urban

08/25/2011 10:48 AM

Cc:

Vicki_Bennett, rdelegge, "Bill Rees", "Greg Sorenson"

Hide Details

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To: Joyce Ackerman/R8/USEPA/US@EPA, "David Wilson"
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<brees@utah.gov>, "Greg Sorenson" <gsorenson@utah.gov>

David,

Below are the UDEQ comments to the Site Redevelopment Revised Work Plan June 2011. The need to submit both a Demolition Notification and a Fugitive Dust Control Plan to the Utah Division of Air Quality (UDAQ) are cited in section *2.9 Permits*. However, the description of the work in the Work Plan under sections *2.3 Building Demolition and Site Grading* and *3.2 Dust Suppression and Air Quality Protection* does not sufficiently address the UDAQ Rules regarding proper work procedures for asbestos demolition and controlling fugitive dusts.

2.3 Building Demolition and Site Grading

This section should acknowledge that building demolition will proceed according to Utah Division of Air Quality (UDAQ) rules R307-801. This includes general provisions for notification of planned demolition to UDAQ, asbestos work practices, etc.

3.2 Dust Suppression and Air Quality Protection

Because the site is located in an area of non-attainment for PM10, the rules set out in Air Quality Rule R307-309 Non-attainment and Maintenance Areas for PM10: Fugitive Emissions and Fugitive Dust are relevant and appropriate to the site. All dusts originating from any disturbed source area on-site, including clean fill materials, need to be addressed with appropriate dust control measures to prevent the migration of the fugitive dusts off-site. This section should acknowledge general provisions laid out in the rule such as opacity limits and how water will be supplied to the site for dust suppression, etc.

The second part of this section regarding worker personal protection and monitoring seems to be unclear regarding the level of protection to be worn by workers working at the site. The subsurface soils at the site are unknown regarding asbestos contamination but should be considered asbestos containing material (ACM). Workers working in an exclusion zone with exposed subsurface soils should have at minimum tyvek suits and breathing protection.

If you have questions or concerns regarding these comments, do not hesitate to call me at (801) 536-0071.

Thanks,

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